


JOHNSON MATTHEY, INC.
380 LAPP ROAD, MALVERN, PA 19355 - 1210 USA
T + 610.971.3100 F + 610.971.3116

07-12-7
JM  Marty Lassen
Johnson Matthey
Catalysts

Statement
Of
Johnson Matthey
On The

California Air Resources Board Hearing Agenda Item 07 -12- 7
Public Hearing to Consider the Adoption of Proposed Regulation to Control Emissions from In-Use On-Road
Diesel-Fueled Heavy-Duty Drayage Trucks at Ports and Intermodal Rail Yard Facilities

Good morning Madam Chair and Members of the Board. My name is Marty Lassen and I am the Director of Commercial Development for Johnson Matthey's heavy-duty diesel business in North America. Johnson Matthey appreciates the opportunity to provide comments on the proposed regulation for In-Use On-Road Diesel-Fueled Heavy-Duty Drayage Trucks at Ports

Johnson Matthey is a technology company that has been providing advanced catalytic solutions to reduce emissions for over thirty years. We have worked with both the ARB and EPA to develop and provide ever increasingly advanced technology solutions to reduce emissions from both mobile and stationary sources. Johnson Matthey fully supports the goal of the ARB's Diesel Risk Reduction Program to significantly reduce particulate matter from California's inventory of existing diesel engines.


Johnson Matthey has existing business relationships with a number of North American diesel engine manufacturers. We are a major supplier of emission control technology for the EPA's 2007 on-road rule and we are working with the engine OE's on the second phase of the rule for further NOx reductions in 2010. At the same time, Johnson Matthey is already working with several non-road diesel engine and machine manufacturers for application of emission control technology for the EPA's Non-Road rule for Tier 4 engines.

With regard to retrofit, Johnson Matthey technology has been verified by both ARB and EPA for retrofit of on-road legacy vehicles. Additionally, Johnson Matthey continues to pursue verification for filter technologies to be used on model year 2004 - 2006 EGR engines, as well as combined NOx/PM technologies that will provide 60 to 70% NOx reduction in addition to Level 3 PM reductions. As to experience, Johnson Matthey has retrofit over 150,000 vehicles over the past 12 years.

Johnson Matthey supports ARB's efforts to control emissions from in-use on-road diesel-fueled heavy-duty drayage trucks at ports and intermodal rail yard facilities. However, we do believe that one element of the proposed control measure should be amended. Currently, the phase 1 requirement is that by December 31, 2009, all drayage trucks must be equipped with engines model years 1994 - 2003 and certified to California or federal emissions standards and equipped with a verified Level 3 VDECS for PM control, or a 2004 model year engine certified to California or federal emissions standards, or meets or exceeds 2007 California or federal emissions standards.

We expect that a Johnson Matthey Level 3 VDECS for engine model years 2004 to 2006 will be verified by ARB by mid-2008. As such, we would suggest that the language for these model years be amended such

ENVIRONMENTAL CATALYSTS AND TECHNOLOGIES



that if a Level 3 VDECS is verified, that the installation of this Level 3 VDEC be required as well and installed by December 31, 2009.

Over the past few months during the development of this proposed regulation, ARB staff has questioned the industry's capability of potentially supplying 20,000 Level 3 VEDECS in the space of only 2 years. Johnson Matthey has responded that industry is capable of supplying Level 3 VDECS in these quantities. Without relying on any other supplier's capabilities, Johnson Matthey has 12 manufacturing facilities located worldwide. Per our Press Release last week, JM is currently in the process of building two additional manufacturing facilities, one in Western Pennsylvania and one in Macedonia. The construction of the facility in Western Pennsylvania brings the total North American facilities to three, two in the US and one in Mexico. The combined capacity of JM's manufacturing ability will be over 55 million catalysts and filters per year and the excess capacity built into our plans will readily deal with only 20,000 VDECS over two years.

Thank you again.

